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May 13, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on the HPV test plan for 1,3-diphenylguanidine

Dear Administrator Leavitt:

The following comments on the American Chemistry Council Rubber and Plastic Additives Panel (RAPA) test plan for 1,3 diphenylguanidine are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

RAPA submitted its test plan on December 10, 2003 for the chemical 1,3-diphenylguanidine (CAS RN 102-06-7). Extensive existing data fulfills the OECD SIDS data endpoints required by the program, and no new animal testing is proposed. In addition to the abundance of animal data, human exposure data is also available. The SIDS initial assessment profile submitted as a test plan does not recommend further human health work be conducted.

Although a more complete test plan is preferable, we concur that no additional animal testing is necessary under the scope of the HPV program. This test plan is an example of the thorough literature research that is needed to be consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to toxicology. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 335, or via e-mail at kstoick@pcrm.org.

Sincerely,

Kristie M Stoick, M.P.H.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research